

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DAVID LIRA

No. 23 CR 54-3

Judge Mary M. Rowland

**GOVERNMENT'S MOTION FOR LEAVE TO FILE A CONSOLIDATED
RESPONSE TO DEFENDANT'S PRETRIAL MOTIONS *INSTANTER* THAT
EXCEEDS THE PAGE LIMITS UNDER LOCAL RULE 7.1**

The United States of America by its attorney, ANDREW S. BOUTROS, United States Attorney for the Northern District of Illinois, hereby requests that the Court allow it to file its Consolidated Response to defendant's pre-trials motions that is in excess of the page limit set by Northern District of Illinois Local Rule 7.1. In support of this request, the government states as follows:

1. On April 23, 2025, the Court ordered the government to respond by May 14, 2025 to defendant's motions to dismiss the indictment for error in grand jury proceedings (Dkt. No. 107), to dismiss Counts Nine through Twelve of the superseding indictment (Dkt. No. 110), and to strike surplusage from the superseding indictment and for other miscellaneous relief (Dkt. No. 109). Dkt. No. 116. On April 28, 2025, the Court ordered the government to respond by May 26, 2025 to defendant's motion to sever counts (Dkt. No. 119). Dkt. No. 118.

2. The government seeks to file a consolidated response to all of these pretrial motions that is approximately 49 pages long. The government requests that the Court allow it to exceed the page limit so that it may fully explain its position as to why these motions should all be denied.

3. The government has conferred with the defense, who advises that it does not object to the government's request to file an oversized brief.

WHEREFORE, the government respectfully requests that the Court permit to exceed the 15-page limit in Local Rule 7.1 and file its 49-page consolidated response to defendant's pretrial motions.

Dated: May 14, 2025

Respectfully submitted,

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